

HON. JAMAL N. WHITEHEAD

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

VALVE CORPORATION,

Plaintiff,

v.

LEIGH ROTHSCHILD, ROTHSCHILD  
BROADCAST DISTRIBUTION SYSTEMS,  
LLC, DISPLAY TECHNOLOGIES, LLC,  
PATENT ASSET MANAGEMENT, LLC,  
MEYLER LEGAL, PLLC, AND SAMUEL  
MEYLER,

Defendants.

Case No. 2:23-cv-1016

**DECLARATION OF KATHLEEN R.  
GEYER IN SUPPORT OF PLAINTIFF  
VALVE CORPORATION'S MOTION TO  
STRIKE**

NOTE ON MOTION CALENDAR:  
**January 10, 2025**

Complaint Filed: 07/07/2023

ORAL ARGUMENT REQUESTED

1 I, Kathleen R. Geyer, declare as follows:

2 1. I am an attorney duly licensed to practice law in the State of Washington and  
3 admitted to this Court. I am an associate in the law firm of Kilpatrick Townsend & Stockton LLP,  
4 counsel for Plaintiff Valve Corporation in the above referenced action.

5 2. I have personal knowledge of the facts stated in this declaration and, if called upon  
6 to do so, I could and would competently testify thereto.

7 3. Attached hereto as **Exhibit 1** is a true and correct copy of excerpts from the  
8 transcript of the September 20, 2024 motion hearing before this Court.

9 4. Attached hereto as **Exhibit 2** is a true and correct copy of an email chain between  
10 counsel for Valve and counsel for Defendants with the subject “Vave v. Rothschild, et al. – follow  
11 up re: amending counterclaims.”

12 5. Attached hereto as **Exhibit 3** is a true and correct copy of email from myself to  
13 counsel for Defendants dated November 19, 2024.

14 6. Attached hereto as **Exhibit 4** is a true and correct copy of email chain between  
15 counsel for Defendants and counsel for Valve with the subject “Valve v. Rothschild, et al. – Meet  
16 and Confer re Motions to Dismiss and Strike Defendants’ Amended Answer & Counterclaims.”

17 I declare under penalty of perjury under the laws of the United States of America that the  
18 foregoing is true and correct.

19 Executed on December 20, 2024 at Seattle, Washington.

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21 /s/ Kathleen R. Geyer  
Kathleen R. Geyer  
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